REMARKS

Claims 11-22 are pending in the present patent application. Claims 11-22 stand rejected. This application continues to include claims 11-22.

Claims 11-22 were rejected under 35 U.S.C. §103(a) as being unpatentable over Hall, U.S. Patent Application Publication No. 2002/0138614 A1, (hereinafter, Hall) in view of Slobodin, et al., U.S. Patent Application Publication No. 2003/0072429 A1 (hereinafter, Slobodin). Applicants respectfully request reconsideration of the rejection of claims 11-22 under 35 U.S.C. §103(a) in view of the following.

Hall is directed to a method and apparatus to manage the dynamic assignment of network addresses (paragraph 0012). One embodiment includes a client proxy that resides on a device, referred to as a network gateway, that provides access to a network (paragraph 0012). The client proxy is capable of receiving a request for assignment of a network address from a client, procuring the network address on behalf of the client from a network address provider, and managing use of the network address for the client (paragraph 0012).

A process 300, executed by a processor 202, performs the programming logic for steps 302-312 of Fig, 3, wherein a request for a secure connection is received at block 302, a secure connection is initiated at block 304, and a determination is made as to whether a recognized protocol is making the request for a secure connection at block 306 (paragraph 0031). If the protocol is not recognized, the processing logic ends, otherwise, a network address is requested from a network address provider at block 308, a determination is made as to whether a valid network address has been returned at block 310, and if there was no valid network address returned, the processing logic ends, whereas if a valid network address is returned, the process for creating a secure connection continues at block 312 (paragraph 0031).

Slobodin is directed to establishing dataconferencing sessions between two or more geographically remote conference sites (paragraph 0002), wherein a remote projector and imaging processing subsystem are used at each site (Fig. 1).

Slobodin also discloses an embodiment of a dataconferencing system in which two image source devices are used to generate image content concurrently and share the image content between the sites for display on the display devices in split-screen format (paragraph 0023, Fig. 9). The dataconferencing system arrangement 900 employs local and remote computer workstations 902 and 904 as image sources located at respective local and remote sites 910 and 912 (paragraph 0075, Fig. 9). Local and remote computer workstations 902 and 904 execute multi-source presentation management software for facilitating presentation of visual images; for example, local and remotely sourced image content may be presented in a side-by-side manner in split-screen displays 920 and 922 (paragraph 0075, Fig. 9).

Applicants believe that claims 11-22 patentably define Applicants' invention over Hall and Slobodin, taken alone or in combination, for at least the reasons set forth below.

Claim 11 is directed to a method of communicating with a shared imaging apparatus connected to a computer network, wherein communication over said network is facilitated through use of network packets.

Claim 11 recites, in part, providing said shared imaging apparatus with networking hardware; and providing said shared imaging apparatus with imaging apparatus firmware.

Hall does not disclose, teach, or suggest a shared imaging apparatus with imaging apparatus firmware, as acknowledged by the Examiner. In addition, Applicants respectfully submit that Slobodin does not disclose, teach, or suggest a shared imaging apparatus with imaging apparatus firmware.

In rejecting claim 11, it is asserted that Slobodin discloses a shared imaging apparatus in the form of two image source devices that are used to generate image content and share the image content.

However, shared image content, as disclosed by Slobodin, is not a shared imaging apparatus within the context of Applicants' specification and claims. In addition, Slobodin clearly discloses in Fig. 1 two projectors and two image processing subsystems, one for each site. There is simply no aspect to the Slobodin disclosure as pertains to a shared imaging apparatus, i.e., an imaging apparatus that is shared.

Similarly, Slobodin paragraph 0075 and Fig. 9 discloses local and remote computer workstations 902 and 904 as image sources located at respective local and remote sites 910 and 912, and that local and remote computer workstations 902 and 904 execute multi-source presentation management software for facilitating presentation of visual images.

Thus, rather than a shared imaging apparatus with imaging apparatus firmware, Slobodin discloses shared image content displayed using two different systems, one at each site. The systems that display the images themselves are clearly not shared, but rather, used concurrently, as explicitly disclosed by Slobodin in the paragraph 0023. Thus, rather than a shared imaging apparatus, Slobodin discloses two separate systems that display shared image content at two different sites.

Accordingly, Hall and Slobodin, taken alone or in combination, do not disclose, teach, or suggest providing a shared imaging apparatus with networking hardware; and providing the shared imaging apparatus with imaging apparatus firmware, as recited in claim 11.

Claim 11 also recites defining a data channel associated with said networking hardware; instructing said networking hardware to accept information on said data channel from a user that

owns said data channel; processing automatic Internet Protocol (IP) address negotiation network packets with said imaging apparatus firmware when said data channel is not owned; and processing second types of network packets, different from said automatic IP address negotiation network packets, by said networking hardware of said shared imaging apparatus when said data channel is owned.

In their previous Response, electronically filed October 26, 2007, Applicants showed that Hall does not disclose, teach, or suggest the above-recited subject matter of claim 11.

However, the Examiner has not responded to Applicants' arguments. Instead, the Examiner repeats the rejection, relying on paragraphs 0035 to 0038 of Hall, but without addressing Applicants' previous rationale. Under MPEP 707.07(f), an examiner must provide clear explanations of all actions taken by the examiner during prosecution of an application, and where the applicant traverses any rejection, the examiner should, if he or she repeats the rejection, take note of the applicant's argument and answer the substance of it.

Applicants respectfully request the Examiner to consider and respond to Applicants' arguments regarding the above-recited subject matter in order to allow Applicants the full opportunity to prosecute their patent application before the U.S. Patent and Trademark Office.

As set forth in their previous Response, although the Hall method acts upon a request for a secure connection and may obtain a network address, Hall does <u>not</u> disclose, teach, or suggest instructing the networking hardware to accept information on the data channel from a user that owns the data channel; processing automatic Internet Protocol (IP) address negotiation network packets with the imaging apparatus firmware <u>when the data channel is not owned</u>; and processing second types of network packets, different from the automatic IP address negotiation network

packets, by the networking hardware of the shared imaging apparatus <u>when the data channel is</u> <u>owned</u>.

In other words, Hall does not disclose, teach, or suggest that networking hardware is instructed to accept information on a channel from a user that owns the channel, and <u>processing</u> <u>one type of network packets when the channel is not owned, and processing other types of</u> <u>network packets different from the first network packets, when the channel is owned</u>.

Hall simply <u>does **not** disclose, teach, or suggest that the type of network packets being</u> <u>processed depends on whether a data channel is or is not owned</u>, in the manner recited in claim 11.

Hall paragraphs 0035-0036 disclose that a client proxy module is configured to request an assignment of an IP address from a network address provider in accordance with a network address assignment protocol, and that a single client proxy may be configured to receive requests for secure virtual connections that may be communicated using any number of recognized protocols that may differ from the assignment protocol used by a particular private network.

However, requesting an IP address assignment from a network address provider, and configuring a client proxy to receive requests using different protocols, as disclosed by Hall, does <u>not</u> in any manner disclose, teach, or suggest <u>that the type of network packets being processed</u> <u>depends on whether a data channel is or is not owned</u>, as recited in claim 11.

Similarly, whether a client proxy may receive other information associated with the IP address, e.g., an assignment identifier with the IP address, as disclosed at paragraph 0037, does not in any manner disclose, teach, or suggest <u>that the type of network packets being processed</u> <u>depends on whether a data channel is or is not owned</u>, as recited in claim 11.

Slobodin also does not disclose, teach, or suggest that the type of network packets being processed depends on whether a data channel is or is not owned, nor is it so asserted.

Accordingly, for at least the reasons set forth above, Applicants respectfully submit that Hall and Slobodin, taken alone or in combination, do not disclose, teach, or suggest the subject matter recited in claim 11. Claim 11 is thus believed allowable in its present form.

Claims 12-22 are believed allowable due to their dependence, directly or indirectly, on otherwise allowable base claim 11. In addition, claims 12-22 further and patentably define the invention over Hall and Slobodin, taken alone or in combination, for at least the reasons set forth in the their previous Response, electronically filed October 26, 2007, since Hall does not disclose, teach, or suggest the subject matter of claims 12-22, as set forth therein, and Slobodin does not make up for the deficiency of Hall as with respect to claims 12-22, nor is it so asserted.

In their previous Response, Applicants showed that Hall does not disclose, teach, or suggest the above-recited subject matter of claim 12-22.

However, the Examiner has not responded to Applicants' arguments. Under MPEP 707.07(f), an examiner must provide clear explanations of all actions taken by the examiner during prosecution of an application, and where the applicant traverses any rejection, the examiner should, if he or she repeats the rejection, take note of the applicant's argument and answer the substance of it.

Applicants respectfully request the Examiner to consider and respond to Applicants' arguments regarding claims 12-22 in order to allow Applicants the full opportunity to prosecute their patent application before the U.S. Patent and Trademark Office.

Regarding claim 13, claim 13 is directed to the method of claim 11, wherein when said data channel is not owned, then determining whether to place said shared imaging apparatus in an

automatic IP address negotiation state, and if said shared imaging apparatus is placed in said automatic IP address negotiation state, then attempting to automatically assign an IP address to said shared imaging apparatus.

The relied-upon paragraph 0033 pertains to a time for which a client may use a network address, and the relied-upon paragraphs 0036-0039 pertain to obtaining an IP address for a client, which do <u>not</u> in any manner disclose, teach, or suggest a determination as to whether to place a shared imaging apparatus in an automatic IP address negotiation state, and if so, attempting to automatically assign an IP address to the shared imaging apparatus, as recited in claim 13.

The Hall clients are computers, and are <u>not shared imaging apparatuses</u>. Also, the Hall client proxy module resides in a program partition 212 of a gateway (paragraph 0034), which is <u>not a shared imaging apparatus</u>, but rather, is a network gateway that provides access to a network (paragraph 0012).

In addition, Hall does <u>not</u> disclose, teach, or suggest that the client proxy module <u>determines whether to place a shared imaging apparatus in an automatic IP address negotiation state, *and if so*</u>, attempts to automatically assign an IP address to the shared imaging apparatus, as recited in claim 11.

Slobodin does not disclose, teach, or suggest the subject matter of claim 13, nor is it so asserted.

Accordingly, Hall and Slobodin, taken alone or in combination, do not disclose, teach, or suggest the subject matter of claim 13. Claim 13 is thus believed allowable in its own right.

Claim 18 is directed to the method of claim 11, wherein when said data channel is not owned, then determining whether to place said shared imaging apparatus in an automatic Internet Protocol (IP) address negotiation state, and if said shared imaging apparatus is placed in said

automatic IP address negotiation state, then attempting to automatically renew a current IP address for said shared imaging apparatus.

Claim 18 is believed allowable in its own right for substantially the same reasons as set forth above with respect to claim 13.

Claim 20 is directed to the method of claim 11, wherein when said shared imaging apparatus is in an idle state, then determining whether to place said shared imaging apparatus in an automatic Internet Protocol (IP) address negotiation state, and if said shared imaging apparatus is placed in said automatic IP address negotiation state, then attempting to automatically assign an IP address for said shared imaging apparatus.

Claim 20 is believed allowable in its own right for substantially the same reasons as set forth above with respect to claim 13.

In addition, Hall and Slobodin, taken alone or in combination, simply do not disclose, teach, or suggest making any determinations based on whether a shared imaging apparatus is in an idle state, as recited in claim 20.

Accordingly, for at least the reasons set forth above, Applicants respectfully submit that Hall does not disclose, teach, or suggest the subject matter of claims 11-22. Claims 11-22 are thus believed allowable in their present respective forms, and Applicants respectfully request the Examiner to withdraw the rejection of claims 11-22 under 35 U.S.C. 103(a).

For the foregoing reasons, Applicants submit that no combination of the cited references teaches, discloses or suggests the subject matter of the pending claims. The pending claims are therefore in condition for allowance, and Applicants respectfully request withdrawal of all rejections and allowance of the claims.

In the event Applicants have overlooked the need for an extension of time, an additional extension of time, payment of fee, or additional payment of fee, Applicants hereby conditionally petition therefor and authorize that any charges be made to Deposit Account No. 20-0095, TAYLOR & AUST, P.C.

Should any question concerning any of the foregoing arise, the Examiner is invited to telephone the undersigned at (317) 894-0801.

Respectfully submitted,

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